

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268

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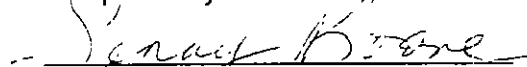
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Postal Rate and Fee Changes, 1997  
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Docket No. R97-1

FIRST SET OF INTERROGATORIES  
OF THE NATIONAL NEWSPAPER  
ASSOCIATION TO USPS WITNESS O'HARA  
(NNA/USPS T30-1-6)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the National Newspaper Association hereby submits the attached interrogatories to USPS witness O'Hara: NNA/USPS-T30, No. 1-6. If the designated witness is unable to respond, we request a referral to another witness in possession of the requested information.


Respectfully submitted,

  
Senny Boone  
Tonda F. Rush  
Attorneys  
National Newspaper Association

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the attached document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: September 5, 1997

  
Senny Boone

**FIRST SET OF INTERROGATORIES  
DIRECTED TO USPS WITNESS O'HARA  
NNA/USPS T-30-1-6**

1. Please confirm that effective service standards for Periodicals mail are overnight delivery up to 150 miles (Zones 1 and 2), 2nd day delivery up to 300 miles (Zone 3), 3rd day delivery up to 600 miles (Zone 4), 4th day delivery up to 1,000 miles (Zone 5), 5th day delivery up to 1,400 miles (Zone 6), 6th day delivery up to 1,600 miles (Zone 7) and 7th day delivery up to 1,800 miles (Zone 8). If you cannot confirm, please provide accurate service standards or target delivery dates for Periodicals mail.
2. Please confirm that the effective service standard for within-county mail is overnight. If you cannot confirm, please explain.
3. Please provide any studies, reports or memoranda on the actual on-time delivery of Periodicals mail in FY 95, FY 96 and FY 97.
4. Please provide reports or minutes from any USPS task forces or working groups involving newspaper mail delivery problems and any reports or memoranda on the USPS response to the problems, including any measurement of success or failure in addressing the problems.
5. Did you consider any USPS data on on-time delivery or service complaints in your consideration of 39 U.S.C § 3622(b)(2)? If you did, please provide any workpapers or notes explaining the effect of that calculation on your cost coverage recommendation for Periodicals mail. If you did not, please explain why not.
6. Please confirm that the value to a subscriber of a time-sensitive periodical is reduced if delivery is delayed beyond the service standard or targeted delivery date. How would you calculate the effect upon value of persistent late delivery of the following circumstances:
  - a. a weekly newspaper delivered more than 7 days after publication date to a subscriber within a retail trade zone?
  - b. a daily newspaper delivered more than two days after publication date to a subscriber within a retail trade zone?
  - c. a weekly or daily newspaper delivered in batches of two or three to a subscriber living in a distant zone?
  - d. the effect upon a merchant whose newspaper advertisement is delivered to a subscriber in his retail trade zone a day after the sale being advertised has concluded? Please confirm that the merchant's perception of value would affect his decision to advertise in the future, which in turn would affect the newspaper's financial viability, as well as the size of the newspaper issue in future mailstreams.